

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
ALIA WILLIAMS	:	VIOLATIONS:
	:	18 U.S.C. § 1344 (bank fraud - 1 count)
	:	18 U.S.C. § 2 (aiding & abetting)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. Citizens Bank was a financial institution conducting business in the Eastern District of Pennsylvania and elsewhere, the deposits of which were insured by the Federal Deposit Insurance Corporation.
2. Defendant ALIA WILLIAMS was a customer services representative for Citizens Bank with computer access to account information for customers of Citizens Bank.
3. From on or about October 11, 2005 to on or about December 9, 2005, in the Eastern District of Pennsylvania, and elsewhere, defendant

ALIA WILLIAMS

knowingly executed, and attempted to execute, a scheme to defraud Citizens Bank, and to obtain

monies owned by and under the care, custody and control of Citizens Bank by means of materially false and fraudulent pretenses, representations and promises.

The Citizens Bank Fraud Scheme

It was part of the scheme that:

4. Defendant ALIA WILLIAMS was asked by a person known to the grand jury to use her position as a customer services representative for Citizens Bank to improperly access computerized account information for customers of Citizens bank. The information sought by the person known to the grand jury from WILLIAMS included account numbers, account balances, and the names, addresses and social security numbers of the account holders.

5. Between on or about October 11, 2005, and on or about December 9, 2005, defendant ALIA WILLIAMS used her position at Citizens Bank to improperly acquire account and balance information for Citizens Bank accounts belonging to A.H., A.P., R.H., C.M., B.H., A.R., A.H. and G.M. Defendant WILLIAMS then sold the account and balance information to a person known to the grand jury who used the account information to acquire approximately \$17,370 from Citizens Bank by cashing counterfeit checks on accounts belonging to A.H., A.P., R.H., C.M., B.H., A.R., A.H. and G.M.

All in violation of Title 18, United States Code, Sections 1344 and 2.

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
UNITED STATES ATTORNEY